

UNITED STATES DISTRICT COURT  
DISTRICT OF PUERTO RICO

In re:

THE FINANCIAL OVERSIGHT AND MANAGEMENT  
BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et al.*,

Debtors.<sup>1</sup>

PROMESA  
Title III

No. 17 BK 3283-LTS

**Re: ECF Nos. 20458, 20467, 21902,  
21982**

(Jointly Administered)

**SUPPLEMENT TO DECLARATION OF EDUARDO M. INCLÁN PIETRANTONI IN  
ACCORDANCE WITH THE PUERTO RICO RECOVERY ACCURACY IN DISCLOSURES  
ACT AND RESPONSE TO ORDER TO SHOW CAUSE [ECF NO. 21902]**

I, Eduardo M. Inclán Pietrantonio, under penalty of perjury, declare as follows:

1. I am a Managing Director of Bluhaus Capital, LLC (“Bluhaus”), a Puerto Rico-based advisory and investment management firm. Bluhaus provides consulting services to the Puerto Rico Fiscal Agency and Financial Authority (“AAFAF”), which is the sole entity authorized to act on behalf of Puerto Rico government entities, by virtue of Act 2-2017. Bluhaus has provided such services to AAFAF, under separate contracts, since February 2017 in matters not related to the Title III cases. From time to time, Bluhaus, acting at AAFAF’s instructions, supports other governmental instrumentalities, agencies, and elected officials, officers, or employees of the Commonwealth or other governmental instrumentalities or agencies in their official capacity. Additionally, in the past, since 2018, Bluhaus has supported other governmental entities under separate contracts, including the Puerto Rico Highways and Transportation Authority, the Puerto Rico Industrial Development Company and the Governing Board of the University of Puerto Rico, in matters not related to the Title III cases.


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<sup>1</sup> The Debtors in these Title III Cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (“Commonwealth”) (Bankruptcy Case No. 17-BK-3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17-BK-3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17-BK-3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17-BK-3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17-BK-4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (“PBA” and together with the Commonwealth, COFINA, HTA, ERS, and PREPA, the “Debtors”) (Bankruptcy Case No. 19-BK-5523-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

2. I submit this supplement (the "Supplement") to the declaration (the "Declaration", ECF No. 21982) I made in accordance with the Puerto Rico Recovery Accuracy in Disclosures Act, Pub. L. No. 117-82, 48 U.S.C. § 2178(c) ("PRRADA") and rule 2014(a) of the Federal Rules of Bankruptcy Procedure to make certain additional disclosures contained herein. Unless otherwise stated in this Supplement and the Declaration, I have personal knowledge of the facts set forth herein and, if called as a witness, I would testify thereto.
3. I submit this Supplement to address and provide answers to certain questions raised by the United States Trustee, specifically, whether any entity on Schedule I of the Declaration exceeded 2% of Bluhaus' gross revenue during any year of Bluhaus' representation of the AAFAF.
4. As set forth in Schedule I of the Declaration, Bluhaus disclosed that HTA was a former client. Consistent with that disclosure and to supplement the same, Bluhaus further discloses that HTA's engagement represented approximately 19% of Bluhaus' gross revenues in 2018 and 17% of Bluhaus' gross revenues in 2019.
5. Finally, I reiterate that, to the best of my knowledge, Bluhaus does not represent and will not represent any entity, including AAFAF (or, through AAFAF, certain government entities and individuals in their official capacity as members of the government of Puerto Rico), in matters related to these Title III cases. Furthermore, to the best of my knowledge, I believe that Bluhaus: (i) is a "disinterested person", as that term is defined in section 101(14) of the Bankruptcy Code, relative to any entity or person on the Amended MIP List, and (ii) does not represent or hold an adverse interest in connection with the Title III cases.
6. Bluhaus reserves all rights to amend and/or supplement its disclosures contained herein. If additional MIPs are provided to Bluhaus and any new material relevant facts or relationships are discovered or identified, Bluhaus will promptly file additional supplemental declarations.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that, to the best of my knowledge and after reasonable inquiry, the foregoing is true and correct.

Executed on October 25, 2022

/s/ 

Eduardo M. Inclán Pietrantoni